

UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, DC 20436

**MEMORANDUM ON PROPOSED TARIFF LEGISLATION
of the 111th Congress¹**

[Date approved: April 23, 2010]²

Bill No. and sponsor: S. 2644 (Mr. Jim Bunning of Kentucky).

Proponent name,³ location: Hitachi Automotive Products (USA) Inc., Harrodsburg, KY.

Other bills on product (111th Congress only): None.

Nature of bill: Temporary duty reduction through December 31, 2011.

Retroactive effect: None.

Suggested article description(s) for enactment (including appropriate HTS subheading(s)):

Fuel pumps designed for gasoline/ethanol direct injection fuel systems in internal combustion piston engines, the foregoing pumps capable of delivering fuel at pressures of 3.5 MPa or more but not over 12 MPa (provided for in subheading 8413.30.90).

Check one: ☐ Same as that in bill as introduced.
☒ Different from that in bill as introduced (see Technical comments section).

Product information, including uses/applications and source(s) of imports:

A high pressure fuel pump typically comprises a control valve assembly that includes an armature rod, control valve plate, and fuel intake opening; a pumping chamber that holds and pressurizes fuel by the movement of a plunger controlled by the engine camshaft; a pressure relief valve that controls pressure on the fuel rail by allowing a portion of the fuel to flow back into the pumping chamber; and an outlet check valve that responds to high pressure in the pumping chamber by sealing off the flow of fuel to the engine to maintain the designated pressure level.

High pressure fuel pumps provide the additional pressure required in direct injection gasoline/ethanol engines to move the fuel through high pressure lines to a common rail⁴ fuel line that is connected to all of the engine's fuel injectors. In addition to a low pressure lift pump that delivers fuel from the tank to the engine, the direct injection system requires a secondary high pressure pump to raise the fuel pressure to levels suitable for direct injection into the combustion chamber. Direct injection fuel systems require this higher pressure to atomize the fuel that is pumped through a fuel injector into the engine cylinder.

¹ Industry analyst preparing report: Deborah McNay (202-205-3425); Tariff Affairs contact: Jan Summers (202-205-2605).

² Access to an electronic copy of this memorandum is available at http://www.usitc.gov/tariff_affairs/congress_reports/.

³ The sponsor/proponent did not identify any additional beneficiaries of this bill.

⁴ In a diesel vehicle, such a line may involve solenoid valves or piezoelectric injectors rather than a fuel pump. Such a line may be used in gasoline direct fuel injection systems to increase the fuel pressure.

Direct injection engines are generally viewed as more efficient and cleaner than indirect injection engines because the atomization of the fuel allows it to be burned more completely and cleanly.

The fuel pumps of interest to the proponent are designed for compatibility with gasoline/ethanol fuels to deliver fuel at pressures from 3.5 megapascals through 12 megapascals. These fuel pumps will be imported from Germany and Japan.

Estimated effect on customs revenue for the subject product classifiable in HTS subheading 8413.30.90:

	2010	2011	2012	2013	2014
Col. 1-General rate of duty	2.5%	2.5%	2.5%	2.5%	2.5%
Estimated value <i>dutiable</i> imports ^a	\$56,000,000	\$56,000,000	\$56,000,000	\$56,000,000	\$56,000,000
Customs revenue loss ^{b c}	\$672,000	\$672,000	\$672,000	\$672,000	\$672,000

a/ Dutiable import estimates were provided by industry sources.

b/ At the request of Congress, customs revenue loss is provided for 5 years, although the effective period of the proposed legislation may differ.

c/ The estimated customs revenue loss is based on a temporary reduction of the general rate of duty from 2.5 percent ad valorem to 1.3 percent ad valorem, a reduction of 1.2 percentage points.

Contacts with domestic firms/organizations (including the proponent):

Name of firm/organization	Date contacted	Claim US makes same or competing product(s)?	Submission attached?	Opposition noted?
		(Yes/No)		
Hitachi Automotive Parts (USA), Inc. (Proponent) Doug Bowling, 859-734-8087	01/20/2010	No	No	No
American Honda Motor Company, Inc. Toni Harrington, toni_harrington@hna.honda.com	01/20/2010	No	No	No
Chrysler Group LLC Kathleen Hennessey, kmh17@chrysler.com	01/21/2010	No	No	No
Continental Automotive Systems U.S.A., Inc. Andrew Robart, Fax: 202-347-4015	01/21/2010	No	No	No
Delphi Automotive LLP Dina Vizzaccaro, dina.vizzaccaro@delphi.com	01/21/2010	No	No	No
Denso International America, Inc. Bill Steffan, bill_steffan@denso-diam.com	01/21/2010	No	No	No
Ford Motor Company J. T. Young, jyoun134@ford.com	01/20/2010	No	No	No
General Motors Company Tori Barnes, victoria.barnes@gm.com	01/20/2010	No	No	No

Name of firm/organization	Date contacted	Claim US makes same or competing product(s)?	Submission attached?	Opposition noted?
		(Yes/No)		
Motor & Equipment Manufacturers Association Catherine Boland, cboland@MEMA.ORG	01/21/2010	No	No	No
Nissan North America Yuko Hanada, yuko.hanada@Nissan-Usa.com	01/20/2010	No	No	No
Robert Bosch LLC Norman Johnson, norman.johnson@us.bosch.com	01/21/2010	No	No	No
Siemens Corporation John Mikel, Fax: 202-347-4015	01/22/2010	No	No	No
Toyota Motor Sales, USA, Inc. David Vennett, dvennett@tma.toyota.com	01/20/2010	No	No	No
Visteon Corp. Lydia Brennan, lbrennan@visteon.com	01/21/2010	No	No	No

Technical comments:⁵

It is suggested that the article description of the proposed heading be amended to read as shown on page 1, in order to follow normal HTS usage and to provide an appropriate range of pressure ratings for the subject pumps. We note that the proposed legislation is drafted to provide a duty reduction rather than a suspension, which should be reflected in the title of the bill for clarity.

⁵ The Commission may express an opinion on the HTS classification of a product to facilitate consideration of the bill. However, by law, only the U.S. Customs Service is authorized to issue a binding ruling on this matter. The Commission believes that the U.S. Customs Service should be consulted prior to enactment of the bill.

111TH CONGRESS
1ST SESSION

S. 2644

To suspend temporarily the duty on high pressure fuel pump.

IN THE SENATE OF THE UNITED STATES

NOVEMBER 2, 2009

Mr. BUNNING introduced the following bill; which was read twice and referred
to the Committee on Finance

A BILL

To suspend temporarily the duty on high pressure fuel pump.

1 *Be it enacted by the Senate and House of Representa-*
2 *tives of the United States of America in Congress assembled,*

3 **SECTION 1. HIGH PRESSURE FUEL PUMP.**

4 (a) IN GENERAL.—Subchapter II of chapter 99 of
5 the Harmonized Tariff Schedule of the United States is
6 amended by inserting in numerical sequence the following
7 new heading:

“	9902.01.00	High pressure fuel pumps for gasoline/ethanol direct injection fuel systems capable of delivering fuel at pressures of 3.5 MPa or more and but not over 12 MPa (provided for in subheading 8413.30.90)	1.3%	No change	No change	On or before 12/31/2011	”.
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1 (b) EFFECTIVE DATE.—The amendment made by
2 subsection (a) applies to goods entered, or withdrawn from
3 warehouse for consumption, on or after the 15th day after
4 the date of the enactment of this Act.

